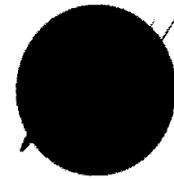


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**02-REN-1038**

<b>DOCKET</b>
DATE <b>JAN 19 2007</b>
REC <b>JAN 22 2007</b>



**WORLD WASTE  
TECHNOLOGIES, INC.**

Honorable Board of the California Energy Commission

January 19, 2007

Re: Comments on Renewable Portfolio Standard Eligibility Guidebook-Second Addition  
Docket No. 02-REN-1038 and Docket No. 03-RPS-1078

To the Board:

We at World Waste Technologies Inc (WWT) appreciate the opportunity to provide comments with respect to the Draft Renewable Portfolio Standard Eligibility Guidebook, put forth pursuant to Senate Bill 1038 and Senate Bill 1078. WWT participated in the most recent workshop held on January 10, 2007, wherein the deadline for written comments was verbally extended to January 22, 2007. WWT provides the comments herein pursuant to such procedure.

WWT is a company whose mission is to extend the notion of recycling beyond generally accepted norms in the current industry. To that end, WWT built a \$22 Million facility in Anaheim, California, which is designed to accept material that is in effect the discharge, residual stream from a Material Recovery Facility (MRF) (this discharge stream is composed of material headed to a landfill). WWT extracts usable materials and thus further lowers the amount of materials requiring land filling. Presently for every 100 tons of MSW generated in California, the successful implementation of AB939 recycling programs administered by the California Integrated Waste Management Board (CIWMB) results in approximately 50 tons of material being recycled and 50 tons of material being land filled. When the WWT facility is fully operational that 50 tons enroute to the landfill would be further reduced to approximately 15 tons. Note that aggressive local recycling programs have already been implemented at the point of collection for all the material collected in the Anaheim MRF, which supplies its residual MSW to World Waste.

The nature of WWT's technology platform uses WWT's proprietary front end process to extract metals, glass, plastic, rock and certain biodegradable organics, yielding a predominantly cellulosic waste stream. Currently we refine that cellulose into unbleached fiber for sale to paper mills who use the fiber as raw material in making new cardboard boxes and other packing-grade paper board. Going forward we plan to also consume several of our material streams in a state-of-the-art gasification process. This gasification system would convert cellulosic feedstock and other streams into a biogas which in turn would be used as fuel to a boiler with the resulting steam powering a conventional steam turbine for the generation of renewable electricity.

As you know, gasification along with anaerobic digestion and hydrolysis are endorsed by the California Integrated Waste Management Board (CIWMB) as technologies which can potentially further reduce landfill requirements below current levels. WWT feels with our unique process we have a solution which is aligned with the missions of both the CEC and the CIWMB in a unique fashion.

In reading of Section II.B.6 (pages 21 and 22) of the recently published "Renewables Portfolio Standard Eligibility Guidebook- Second Edition", WWT feels that the definition with respect to the conversion of Solid Waste clearly embraces both our process and the technology "gasification", as is currently available commercially. WWT further feels that in order to avoid potential ambiguities, in the criteria, that WWT would propose certain language modifications, which we believe more clearly defines gasification in the context of both the spirit of the proposed guidelines, SB 1038 and SB 1078, as well from a commercially available technological perspective.

Gasification of biomass (including municipal solid waste) is clearly recognized by the U.S. Department of Energy as a Renewable Energy alternative. WWT would propose that in the paragraph II.B.6 that the term gasification be inserted so that the new paragraph would read:

**"2. Solid Waste Conversion Facilities: A facility that uses a two-step process to create energy whereby in the first step a non-combustion thermal process which consumes no excess oxygen (Gasification) is used to convert MSW to a clean burning fuel, and then in the second step this clean burning fuel is used to generate electricity, is eligible for the RPS if it is located in-state or satisfies the out-of-state requirements, and meets all of the following criteria in accordance with Public Resources Code Section 25741, subdivision (b) (3)."**

With respect to Section II.B.6.b, WWT is assuming that this criterion is intended to apply to any releases from the conversion of any solid waste stream into a biogas and not intended to apply to the conversion of that biogas to electricity or fuel, as defined in the above paragraph. As you know a strict interpretation of this criteria applied to all processes would eliminate even anaerobic digestion, landfill gas, biomass, biodiesel as renewable alternatives. As such WWT would suggest a clarification of this section with the modifications of that section as follows:

**"b. The technology of the conversion of solid waste to clean burning gases produces no discharges directly to the atmosphere of air contaminants or emissions including greenhouse gases as defined...."**

WWT appreciates the opportunity to comment and provide these comments and look forward to working with your staff to provide facilities in the State of California as the model for optimum recycling and the generation of renewable electricity.

If you have any questions or comments please feel free to contact me at your convenience. Indeed, we would be delighted to come to Sacramento to present our technology to the CEC staff in order to clarify the details of our process. In fact, we have scheduled meetings with the CIWMB on February, 15, 2007 and could easily schedule time with CEC staff at your convenience around that time.

Respectfully Submitted

  
John Pimentel, Chairman/CEO  
World Waste Technologies Inc.